

# **EXHIBIT A**

**KAHN GAUTHIER SWICK, LLC**

Michael A. Swick (MS-9970)  
Kim E. Miller (KM-6996)  
12 East 41<sup>st</sup> Street, 12<sup>th</sup> Floor  
New York, NY 10017  
Telephone: (212) 696-3730  
Fax: (504) 455-1498

**KAHN GAUTHIER SWICK, LLC**

Lewis S. Kahn  
650 Poydras Street, Suite 2150  
New Orleans, LA 70130  
Telephone: (504) 455-1400  
Fax: (504) 455-1498

*Counsel for the Chen Group and  
Proposed Lead Counsel for the Class*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BRICKMAN INVESTMENTS, INC.,  
Individually And On Behalf of All Others  
Similarly Situated,

Plaintiff,

VS.

ALLOT COMMUNICATIONS, LTD., YIGAL  
JACOBY, RAMI HADAR AND ADI SAPIR,

Defendants.

DOCKET NUMBER: 07-cv-3455

HON. RICHARD J. HOLWELL

(Caption continued on the following page)

**JOINT DECLARATION OF CHEN GROUP MEMBERS SHICHAO CHEN, CYNTHIA  
HOBER AND ROBERT JONKHEER IN FURTHER SUPPPORT OF THE MOTION OF  
THE CHEN GROUP TO CONSOLIDATE RELATED ACTIONS; TO BE APPOINTED  
LEAD PLAINTIFF; AND TO APPROVE PROPOSED LEAD PLAINTIFF'S CHOICE  
OF COUNSEL**

GERALD BILGER, Individually And On Behalf  
of All Others Similarly Situated,

Plaintiff,

VS.

ALLOT COMMUNICATIONS, LTD., YIGAL  
JACOBY, RAMI HADAR AND ADI SAPIR,

Defendants.

DOCKET NUMBER: 07-cv-3815

HON. RICHARD J. HOLWELL

ELIYAHU MOKHTAR, Individually And On  
Behalf of All Others Similarly Situated,

Plaintiff,

VS.

ALLOT COMMUNICATIONS, LTD., YIGAL  
JACOBY, RAMI HADAR AND ADI SAPIR,

Defendants.

DOCKET NUMBER: 07-cv-5456

HON. RICHARD J. HOLWELL

SHANNON VINSON, Individually And On  
Behalf of All Others Similarly Situated,

Plaintiff,

VS.

ALLOT COMMUNICATIONS, LTD., YIGAL  
JACOBY, RAMI HADAR AND ADI SAPIR,

Defendants.

DOCKET NUMBER: 07-cv-5457

HON. RICHARD J. HOLWELL

Allot Communications, Ltd.. (“Allot”) investors Shichao Chen, Cynthia Hober and Robert Jonkheer (members of the “Chen Group”) hereby declare as follows:

1. We submit this joint declaration in further support of our motion for appointment as Lead Plaintiff and for approval of selection of Lead Counsel, pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”).

2. I, Shichao Chen, hold a B.S. degree in computer science from Beijing University and a Masters degree in business management from the University of Surrey, U.K. I am a professional service engineer in a multinational information technology company. I manage my own portfolio and invested in Allot stock.

3. I, Cynthia Hober, hold a B.A. in Liberal Arts, with a minor in microbiology, from the University of Maryland. I have been a workers’ compensation claims specialist for the past 20 years. I manage my own portfolio and invested in Allot stock.

4. I, Robert Jonkheer, am retired. I worked for over 43 years in the computer industry in various positions. I manage my own portfolio and invested in Allot stock.

5. I have no interests antagonistic to those of the Class and I do not believe that I am subject to any unique defenses.

6. I understand that I am seeking to be appointed as the lead plaintiff as part of a small, cohesive, manageable three member group that, if appointed as lead plaintiff, will work together, and direct the activities of our chosen counsel, Kahn Gauthier Swick, LLC (“KGS”), in the prosecution of this action. The Chen Group believes that our collective and shared knowledge gained through investing in Allot shares will assist counsel in prosecution of this action on behalf of the Class, and that the group’s differing experiences and expertise will

provide a broad perspective to the decision-making process in this action. Taken together, I believe the Chen Group will provide fair and adequate representation of the Class.

7. I understand that to fulfill the group's fiduciary duties and obligations as lead plaintiff, I must fairly and adequately represent the Class by vigorously prosecuting this case on behalf of the Class, as part of the Chen Group.

8. I understand my responsibilities as lead plaintiff and will fulfill these responsibilities to the best of my ability. I further understand that as lead plaintiff, the Chen Group will have the final responsibility for supervising its counsel and for making important litigation decisions. To that extent, the Chen Group intends to oversee its counsel and monitor the progress of the litigation to discharge its duties to the Class. In discharging those duties, it will, among other things, review pleadings and motions papers; obtain regular status reports on the progress of the litigation on developments in the action; potentially produce documents, answering interrogatories, and/or sitting for a deposition; and have input into litigation decisions and strategies, and involvement in the final approval of any major litigation decisions, including whether or not to settle the litigation and, if so, for how much.

9. As a member of this small, cohesive group, I intend to work closely and cooperatively with the other members of the group, to oversee the litigation in a manner intended to best vindicate the interests of all Class members. As a member of the Chen Group, I have communicated with the other member of the group, and feel strongly that we, as a group, can effectively and efficiently prosecute this action together. We will do so by, among other means, communicating, individually or as a group, with each other and with counsel, to the extent we determine necessary to fairly and adequately represent the interests of the Class.

10. We intend to continue to regularly communicate with our counsel and with each other, as we have done thus far, through the use of email, Internet and/or telephone. As proposed lead plaintiffs, we have agreed upon how we will make decisions and will endeavor to make all decisions unanimously, or where unanimity is not possible, the group has agreed to defer to Shichao Chen, as its spokesperson, based upon his large losses, educational and business experience. Based on our communications to date, however, I do not foresee a circumstance where the members of our group could not reach a mutually agreeable solution to any issue that might arise.

11. The group has selected Shichao Chen to serve as the Chen Group's spokesperson and liaison with counsel and the Court. Although I understand that emergencies rarely arise in the course of litigation of this nature that would not permit sufficient time for our group to be consulted, particularly in light of modern technological means of communication, to the extent such an emergency arises and our group is unable to meet together in sufficient time to collectively make a decision, Shichao Chen will be responsible for making such decisions.

12. Additionally, I understand that our group will meet regularly—most often by telephonic conference—to discuss the progress of the litigation and to approve litigation strategies recommended by our counsel. The Chen Group anticipates those meetings will occur as often as necessary, depending on the activity in the case. The Chen Group also anticipates some of those meetings will be without counsel attending in order for the group to discuss counsel's recommendations and performance amongst ourselves. The Chen Group understands that litigation of this nature has active and inactive periods, and each member will make themselves available, as needed to fulfill its role as lead plaintiff.

13. In the event that the Court determines it will reconfigure the Chen Group and select a particular member(s) from the Chen Group to serve as lead plaintiff(s), I am willing to serve as such member. Furthermore, in the event the Court does reconfigure the Chen Group and I am not selected as a lead plaintiff, I fully support any such reconfiguration that the Court determines is in the Class members' best interests.

14. I have selected the Chen Group's counsel, KGS, to be lead counsel for the Class, based on its experience in securities litigation and other class action litigation and resources. I have reviewed KGS' firm biography and I am satisfied that the attorneys of KGS are highly experienced in the prosecution of class action securities cases and will vigorously and diligently prosecute this action at the direction of the Chen Group. I am further satisfied that these attorneys will keep me currently advised of the status of the action in order to assure that I may fulfill my duties as lead plaintiff as part of the Chen Group.

I declare under penalty of perjury that the foregoing is true and correct.

July 16, 2007



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Shichao Chen

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Cynthia Hober

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Robert Jonkheer

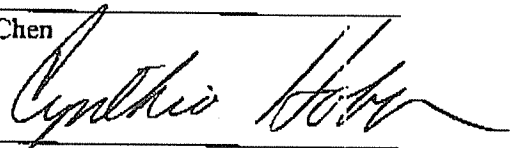
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I declare under penalty of perjury that the foregoing is true and correct.

July 16, 2007

\_\_\_\_\_  
Shichao Chen

  
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Cynthia Hober

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Robert Jonkheer



**Lewis Kahn**

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**From:** Bob Jonkheer [REDACTED]  
**Sent:** Monday, July 16, 2007 10:16 AM  
**To:** Lewis Kahn  
**Subject:** Allot  
**TimeMattersID:** M9B259988CFA2196

Lewis Kahn Counsel,

enclosed find the Joint Declaration and with this my signature below.

I declare under penalty of perjury, that the foregoing is true and correct: Yes

By clicking "send", I intend to sign and execute this Declaration: Yes

7/16/2007 /s/ Robert G. Jonkheer

7/16/2007